

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In Re:	)	In Proceedings for a Reorganization under Chapter 11
	)	
W.R. Grace & Co., <i>et al.</i> ,	)	Case No. 01-01149-JKF
	)	
Debtors.	)	Re: docket no. 14929
	)	
	)	

**AFFIDAVIT OF LESLIE C. MACLEAN**

STATE OF TEXAS )  
                    )  
                    ss.  
COUNTY OF DALLAS )

I, Leslie C. MacLean, being duly subscribed and sworn, hereby depose and state as follows:

1. I am a partner with the law firm of Waters & Kraus, LLP ("Waters & Kraus"), and I have personal knowledge of the facts set forth herein.
2. The only B-readings that Waters & Kraus has withheld from Grace represent facts known or opinions held by experts who were retained or specially employed in anticipation of litigation or preparation of trial, and who are not presently expected to testify at trial.

3. None of the B-readings that Waters & Kraus has withheld were made by B-readers who first screened a claimant – in other words, none of the withheld B-Readings are screenings that were made prior to the time that any other diagnosis of an asbestos-related disease or injury was sought or known.

4. None of the B-readings that Waters & Kraus has withheld were made by B-readers who examined a claimant prior to the time an attorney-client relationship was established between that claimant and Waters & Kraus.

Dated: 4.5.07, 2007

Linda MacLean

SUBSCRIBED AND SWORN  
to before me this 5<sup>th</sup> day  
of April, 2007.

Joanne M. Fisher

